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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

LOURDES VASQUEZ,	)	Case No.: 1:24-cv-00595-JLT-BAM
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	FOR AN EXTENSION OF TIME
vs.	)	
	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 13, 2024, up to and including October 15, 2024. This is Defendant's first request for an extension.

Defendant requests this extension in order to further consider the administrative record in light of the issues raised in Plaintiff's motion. The undersigned has a number of competing deadlines in cases pending in this district and other districts.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: September 10, 2024

/s/ Jonathan O. Pena\*

(\*as authorized via e-mail on September 10, 2024)

JONATHAN O. PENA

Attorney for Plaintiff

Dated: September 10, 2024

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Erin A. Jurrens

ERIN A. JURRENS

Special Assistant U.S. Attorney

Attorneys for Defendant

**ORDER**

Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an extension, up to and including October 15, 2024, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: September 10, 2024

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE